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12 *Attorneys for Defendant Villas*  
13 *at Blue Diamond Springs Association*

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF NEVADA**

10 VENTURES TRUST 2-13-I-H-R BY MCM  
11 CAPITAL PARTNERS, LLC,

12 Plaintiff(s),

13 vs.

14 SATICOY BAY LLC SERIES 4683  
15 AMERTRINE, a Nevada Corporation, VILLAS  
16 AT BLUE DIAMOND SPRINGS  
17 ASSOCIATION, a Nevada non-profit  
18 Corporation, LEVY MILAGROS, an  
19 Individual, DOES INDIVIDUAL 1 through X;  
20 and ROE CORPORATIONS XI-XX,

21 Defendant(s).

Case No.: 2:15-cv-01773-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND RESPONSE DATE TO  
COMPLAINT [DKT. 1]**

*Second Request*

22 Plaintiff, VENTURES TRUST 2-13-I-H-R BY MCM CAPITAL PARTNERS, LLC, by  
23 and through their attorney Thomas Beckom of McCARTHY & HOLTHUS, LLP and  
24 Defendant Villas at Blue Diamond Springs Association (the “Association”), by and through  
25 their attorney Ryan Hastings, of LEACH JOHNSON SONG & GRUCHOW, hereby stipulate  
26 and agree as follows:

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1. The Association has tendered its defense in this action to its insurance carrier and is currently awaiting a coverage decision and notification of assignment of counsel.
2. The Association was previously granted an additional 45-days to prepare a responsive pleading to Plaintiff's Complaint [Dkt.1] up to and including December 11, 2015, to allow the Association's insurance carrier sufficient time to assign counsel to represent the Association's interests in this action.
3. During the 45-day extension, Attorney Hastings calls and email went unreturned. Attorney Hasting was recently advised that the Community Manager had left their position.
4. As a result of this change, Attorney Hastings has been unable to confirm assignment of counsel.
5. The parties now further agree to an additional extension of 45-days to allow the new Community Manager to confirm coverage and assign counsel.

Dated this 14th day of December, 2015.

McCARTHY & HOLTHUS, LLP

LEACH JOHNSON SONG & GRUCHOW

/s/ Thomas N. Beckom

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*Attorneys for Plaintiff*  
*VULTURES TRUST 2013 I-H-R by*  
*MCM CAPITAL PARTNERS, LLC*

/s/ Ryan D. Hastings

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*Attorneys for Defendant Villas at*  
*Blue Diamond Springs Association*

*Ventures Trust 2-13-I-H-R BY MCM Capital Partners, LLC*  
*v. Saticoy Bay LLC Series 4683 Amertrine, et al.*  
USDC Case No.: 2:15-cv-01773-JAD-CWH

**ORDER**

FOR GOOD CAUSE SHOWN and upon the stipulation by the parties,

**IT IS HEREBY ORDERED AND ADJUGDGED** that Defendant Villas at Blue Diamond Springs Association's response is due on or before **January 28, 2016**.

**IT IS SO ORDERED.**

Dated this 16th day of December, 2015.

  
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U.S. MAGISTRATE JUDGE

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